

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION**

UNITED STATES OF AMERICA,)	Case No.: 1:15CR-069
)	
Plaintiff,)	
)	
vs.)	MOTION TO MAINTAIN INMATE AT
)	CURRENT FACILITY
)	
JASON GMOSE,)	
)	
Defendant.)	
)	

Now comes the Defendant, by and through undersigned counsel, and hereby requests this honorable Court to issue an order allowing inmate Jason Gmoser, to be allow to remain in his current placement in the Butler County Jail, in Hamilton, Ohio. Inmate Gmoser has been placed there for several months. In the alternative, Defendant also has an upcoming dental appointment scheduled in Hamilton, Ohio and we would ask that he be allowed to maintain that appointment. This appointment is to finish work that has already been started and has already been paid for. Due to the close proximity to the court and counsel we ask the court to allow inmate Jason Gmoser to be maintained at his current placement.

Respectfully submitted,
CAPARELLA-KRAEMER & ASSOC., LLC

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and accurate copy of the foregoing has been served upon Counsel of Record via e-mail on this 17th day of May, 2022.

s/Bradley M. Kraemer
Bradley M. Kraemer (0070329)
Attorney for Defendant